



Department of Energy
Ohio Field Office
Fernald Environmental Management Project
P. O. Box 538705
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AUG 19 2004

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0377-04

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO THE UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY COMMENTS AND THE FINAL AREA 9, PHASE III ABANDONED
OUTFALL LINE PART ONE EXCAVATION PLAN, EXCAVATION CONTROL PROJECT
SPECIFIC PLAN, CERTIFICATION DESIGN LETTER, AND PROJECT SPECIFIC PLAN FOR
CERTIFICATION SAMPLING**

- References:
- 1) Letter DOE-0363-04, W. Taylor to J. Saric/T. Schneider, "Transmittal of Responses to Ohio Environmental Protection Agency Comments on the Draft Certification Design Letter and Project Specific Plan for Certification Sampling for Area 9, Phase III Abandoned Outfall Line - Part One," dated August 11, 2004
 - 2) Letter DOE-0369-04, W. Taylor to J. Saric/T. Schneider, "Transmittal of Responses to Ohio Environmental Protection Agency Comments on the Draft Area 9, Phase III Abandoned Outfall Line Excavation Plan Part One, Revision B," dated August 11, 2004
 - 3) Letter, J. Saric to J. Reising, "A9 P3 Part One CDL," dated August 12, 2004
 - 4) Letter, J. Saric to J. Reising, "A9 P3 Part One Certification Sampling PSP," dated August 12, 2004



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Mr. James A. Saric
Mr. Tom Schneider

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- 5) Letter, J. Saric to J. Reising, "A9 P3 Part One Excavation Plan," dated August 12, 2004
- 6) Letter, J. Saric to J. Reising, "A9 P3 Part One Excavation Control PSP," dated August 12, 2004
- 7) Letter, T. Schneider to W. Taylor, "Approval - RTC on the Draft CDL and PSP for Certification Sampling for A9PIII AOL-Part 1," dated August 17, 2004
- 8) Letter, T. Schneider to W. Taylor, "Approval - RTC on the Draft A9PIII AOL Excavation Plan, Part One," dated August 17, 2004

Enclosed for your approval are responses to the United States Environmental Protection Agency (USEPA) comments and the following final documents:

- Area 9, Phase III Abandoned Outfall Line Excavation Plan - Part One, Rev. 0
- Project Specific Plan for Excavation Control of Area 9, Phase III (Supplement to 20300-PSP-0011)
- Certification Design Letter for Area 9, Phase III Abandoned Outfall Line - Part One, Rev. 0
- Project Specific Plan for Area 9, Phase III Certification Sampling - Part One, Rev. 0

Both the USEPA and Ohio Environmental Protection Agency (OEPA) comment responses have been incorporated into these final documents and conditional approvals have been received per the above-noted references.

If you have any questions or require additional information, please contact Johnny Reising at (513) 648-3139.

Sincerely,


William J. Taylor
Director

FCP:Reising

Enclosures: As Stated

Mr. James A. Saric
Mr. Tom Schneider

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DOE-0377-04

cc w/enclosures:

J. Reising, OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SR-6J
F. Bell, ATSDR
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:

N. Akgündüz, OH/FCP
K. Johnson, OH/FCP
R. Abitz, Fluor Fernald, Inc./MS64
K. Alkema, Fluor Fernald, Inc./MS01
L. Barlow, Fluor Fernald, Inc./MS41
J. Chiou, Fluor Fernald, Inc./MS64
M. Frank, Fluor Fernald, Inc./MS64
W. Hooper, Fluor Fernald, Inc./MS60
U. Kumthekar, Fluor Fernald, Inc./MS64
S. Lorenz, Fluor Fernald, Inc./MS41
G. Lupton, Fluor Fernald, Inc./MS64
F. Miller, Fluor Fernald, Inc./MS64
D. Nixon, Fluor Fernald, Inc./MS01
T. Poff, Fluor Fernald, Inc./MS65-2
D. Powell, Fluor Fernald, Inc./MS64
T. Snider, Fluor Fernald, Inc./MS64
ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON
AREA 9 PHASE III ABANDONED OUTFALL LINE
EXCAVATION PLAN PART ONE
REVISION B**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

AUGUST 2004

U.S. DEPARTMENT OF ENERGY

**RESPONSES TO
U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL COMMENTS ON PROJECT SPECIFIC PLAN FOR
AREA 9, PHASE III CERTIFICATION SAMPLING
ABANDONED OUTFALL LINE – PART ONE
REVISION B**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

AUGUST 2004

U.S. DEPARTMENT OF ENERGY

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OMMENTS ON

SPECIFIC COMMENTS

- | | | |
|----|---|--|
| 1. | Commenting Organization: U.S. EPA
Section #: 2.3.2
Original Specific Comment #: 1
Comment: The text provides examples of unique soil sample identification numbers that will be used for certification soil samples. The text should be revised to provide samples of the unique identification numbers that will be used for the biased soil samples collected from the floor and sidewalls of the excavation in Section 2.3. The sample locations and identifiers for biased samples should be listed in Appendix B.
Response: Agree that the text should be updated to include an example of the biased soil samples from the floor and the sidewalls of the excavation. However, since the need to collect a biased sample will be determined in the field, the biased samples will not be included in Appendix B. The collection of biased samples will be documented in variances to the PSP as necessary.
Action: The text in Section 2.3.2 has been updated to include an example of the biased soil samples from the floor and sidewalls of the excavation. | Commenter: Saric
Line #: 10 through 33
Code: |
| 2. | Commenting Organization: U.S. EPA
Section #: 6.0
Original Specific Comment #: 2
Comment: The text states that following analysis, any remaining soil will be either sent to the On-Site Disposal Facility (OSDF) if the data shows that the soil is above final remediation levels (FRL) or spread in a certified area if data shows that the soil is below FRL. The material being excavated during removal of the abandoned outfall line is being considered to be above waste acceptance criteria (AWAC) and will be disposed off-site instead of in the OSDF. The text should be revised to state that any remaining soil will be shipped off-site for disposal.
Response: This statement is not applicable to Area 9 Phase III and will be deleted from the document.
Action: The last sentence of Section 6.0 has been deleted. | Commenter: Saric
Line #: 13 and 14
Code: |
| 3. | Commenting Organization: U.S. EPA
Section #: 7.0
Original Specific Comment #: 3
Comment: The text states that samples will be assigned a unique sample number as explained in Section 2.3, and listed in Appendix B. The text in Section 7.0, Section 2.3, and Appendix B should be revised to provide examples of the unique identification numbers that will be used for the biased soil samples collected from the floor and sidewalls of the excavation.
Response: See response to Comment 1 for Section 2.3 and Appendix B. Section 7.0 will not include examples of the unique identification numbers that will be used for the biased soil samples collected from the floor and sidewalls of the excavation since the examples are listed and referenced in Section 2.3.2.
Action: The reference to Section 2.3 found in Section 7.0 has been changed to more specifically reference Section 2.3.2. | Commenter: Saric
Line #: 16
Code: |

**RESPONSES TO
U.S. AND OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON CERTIFICATION DESIGN LETTER FOR
AREA 9, PHASE III ABANDONED OUTFALL LINE
EXCAVATION PLAN PART ONE
REVISION B**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

AUGUST 2004

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